

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

UNITED STATES OF AMERICA §
§
§
V. § NO. 5:14-CR-05-02
§ JUDGES SCHNEIDER/CRAVEN
§
§
SHELLEY LYNN SAMANSKY (02)

ELEMENTS OF THE OFFENSE

You are charged in **Count 1** of the indictment with a violation of 18 U.S.C. § 472 (possession of counterfeited obligations of the United States and aiding and abetting). The essential elements which must be proven to establish a violation of this offense is as follows:

Count 1

18 U.S.C. § 472

First: That you possessed counterfeit money;

Second: That you knew at the time that the money was counterfeit; and

Third: That you possessed the counterfeit money with intent to defraud, that is, intending to cheat someone by making that person think the money was real.

Respectfully Submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

D. Ryan Locker
Assistant United States Attorney
Texas Bar Number 24046307
500 N. Stateline Avenue, Suite 400
Texarkana, Texas 75501
(903) 794-9481